

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

In re: Kung Properties, LLC

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Case No. 19-33739

Debtors

**RESPONSE TO DEBTOR'S LETTER**

Comes now Counsel for Debtor and files her response to Debtor's letter [ECF 27], and states the following:

1. Counsel for Debtor prepared a Motion to Enlarge the Time for which to file motions to employ real estate agent, and disclosure statement and plan of reorganization, which were to be filed contemporaneously with the Motion.
2. The Motion to Enlarge time was based largely upon Debtor's Principals having separated, and Principal Wife traveling extensively throughout the US and abroad on new business ventures.
3. Principal Wife signed two documents evidencing retention of services at an hourly rate, the representation agreement and the application to employ.
4. Debtor has been sent monthly statements to the address on file with this Court.
5. Principal Wife was also advised by Counsel of the Motion for Relief from Stay.
6. Principal Wife chose not to meet with counsel until after the Order lifting Stay was granted, and sent an email to that affect.
7. Rather she chose to call the lender to negotiate with them.
8. Principal Wife chose not to authorize the filing of the disclosure statement, plan of reorganization and motions to employ, and chose to find "a less expensive option."
9. Principal Wife was provided with another copy of the representation agreement, application to employ and billing statements. She left them behind at counsel's office and chose to snap photos of them on her cell phone instead before she left.
10. The injunction to which Principal Wife refers to her through her new counsel, Margaret McClure, has been dissolved.
11. To date Ms. McClure has not entered an appearance.

Wherefore, Counsel respectfully requests this Court consider this response in opposition to the statements made in Debtor's letter to this Court.

Dated this 9<sup>th</sup> day of January, 2020

Respectfully Submitted,

/s/ Jessica L. Hoff

Jessica L. Hoff 24093963

Counsel to Debtors

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above Response was served by electronic service as allowed and by placing the same in the United States Mail, first class postage pre-paid, this January 9, 2020 following and those listed on the mailing matrix attached hereto:

**Kung Properties, LLC**

12335 Kingsride Ln 403

Houston, TX 77024

**US Trustee**

Office of the US Trustee

515 Rusk Ave

Ste 3516

Houston, TX 77002

/s/ Jessica L. Hoff

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Counsel to Debtors

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